

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

**LEWIS MECHANICAL SALES, INC.,
Plaintiff,**

vs.

**DAVID GIRARD, Individually, and
UNION STANDARD INSURANCE
GROUP,**

Defendants.

§
§
§
§
§
§
§
§

**C.A. NO. 2:17-cv-00156
JURY REQUESTED**

AFFIDAVIT OF JOHN SWALLOW

STATE OF TEXAS

§
§
§

COUNTY OF NUECES

BEFORE ME, the undersigned authority, personally appeared John Swallow, who, being by me duly sworn, deposed as follows:

1. "My name is John Swallow. I am of sound mind and one of the counsel of record for Plaintiff, Lewis Mechanical Sales, Inc., and am authorized to make this Affidavit.
2. Attached hereto as Exhibit "A-1" are screenshots and other documents obtained from the Union Standard Insurance Group website evidencing the home office address, Union Standard Insurance Groups President's office location, senior management, and mailing address for Union Standard Insurance Group in Irving, Texas.
3. Additionally, attached hereto as Exhibit "A-2" are screenshots from www.linkedin.com evidencing the Senior Management of Union Standard Insurance Group and their primary place of business, all being in the Dallas/Fort Worth and Irving, Texas, areas.
4. These attachments are true and correct copies of the originals obtained from Union Standard Insurance Group's website.



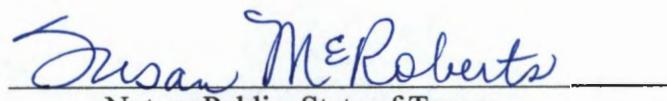
Further, affiant sayeth naught."

SIGNED the 12th day of May, 2017.



JOHN SWALLOW

SUBSCRIBED AND SWORN TO BEFORE ME by the said JOHN SWALLOW on this
the 12th day of May, 2017, to certify which witness my hand and official seal.



Susan McRoberts
Notary Public, State of Texas





**UNION
STANDARD**
INSURANCE GROUP

a Berkley Company

preferred commercial property and casualty insurance

About Products and Services Claim Service Billing and Payment Plans Careers Contact Us Find an Agent Agent Portal

why choose us

success with our customers begins with the first call

A-1
EXHIBIT

contact us

Union Standard Home Office

222 Las Colinas Blvd. W, Suite 1300
Irving, Texas 75039-5433

Mailing Address

P.O. Box 152180
Irving, Texas 75015
Phone: 972-719-2400
Toll Free: 800-444-0049
FAX: 972-719-2401

Billing Questions

Please call or email us at: usigdbsupport@usic.com.

Human Resources

Please call or email us at: employment@usic.com.

Loss Control Services

Please call or email us at: usalosscontrol@usic.com.

Loss Run Requests

Please call or email us at: usigunderwriting@usic.com.

Premium Audit Questions

Please call or email us at: usigpremiumaudit@usic.com.

Marketing and Agency Licensing Requests

Please call or email us at: marketing@usic.com.



REPORT
A CLAIM

**E-PAY
EXPRESS**
Click here to pay your bill.

USExpress
Agent Portal

Agent Portal Log-In. Click Here!





Insurance – Domestic

Union Standard is a regional property and casualty insurance provider offering insurance programs to small and mid-sized businesses across the central southern states.

The Union Standard Insurance Group Difference

In business since 1975, Union Standard Insurance Group offers preferred commercial property and casualty insurance solutions through independent insurance agents located throughout Arizona, Arkansas, New Mexico, Oklahoma and Texas.

We maintain a strong, local presence in each of our markets, keeping underwriting and marketing close to the customer. Our offices are staffed with professionals who understand each of their geographical areas and meet their customers' needs with exceptional underwriting discipline and superior insurance protection.

Our long-term strategy is built around relationships and service. At every level of the company, we respond promptly and fairly with quality client care. Our staff of highly qualified professionals works as a team to provide claims, loss control, audit, underwriting and policy services, offering the expertise and responsiveness that has helped us consistently outperform competitors for more than a decade.

"It's not just what we do, but how we do it" is the work ethic we take to heart. With dedicated employees and services our clients can rely on, we continue to distinguish ourselves from other companies. From small details to larger matters, we do things right the first time, ensuring our clients are taken care of and helping us live up to our core value that "Everything Counts, Everyone Matters".

KEITH MITCHELL

President

222 Las Colinas Boulevard W
Suite 1300
Irving, TX 75039
Tel: (972) 719-2400

At a Glance



INDUSTRIES WE SERVE

- Construction
- Farm and Ranch
- Finance
- Insurance and Real Estate
- Manufacturing
- Retail Trade
- Services
- Transportation
- Wholesale Trade



PRODUCTS

- Auto
- General Liability
- Inland Marine
- Property
- Umbrella
- Workers' Compensation



GEOGRAPHY

Central Southern states, including Arizona, Arkansas, New Mexico, Oklahoma and Texas



DISTRIBUTION CHANNELS

Retailers



AFFILIATIONS & MEMBERSHIPS

- Association of Fire and Casualty Companies in Texas (AFACT)
- Insurance Council of Texas (ICT)
- Trusted Choice



CONNECT WITH US

www.usic.com

[LinkedIn](#)

[Twitter](#)



Insurance – Domestic



Insurance – International



Reinsurance



W. R. BERKLEY CORPORATION

About W.R. Berkley Corporation

W. R. Berkley Corporation, founded in 1967, is one of the nation's premier commercial lines property casualty insurance providers. Each of the operating units in the Berkley group participates in a niche market, requiring specialized knowledge about a territory or product. Our competitive advantage lies in our long-term strategy of decentralized operations, allowing each of our units to identify and respond quickly and effectively to changing market conditions and local customer needs. This decentralized structure provides financial accountability and incentives to local management and enables us to attract and retain the highest-caliber professionals. We have the expertise and resources to utilize our strengths in the present environment and the flexibility to anticipate, innovate and respond to whatever opportunities and challenges the future may hold.



Insurance Companies

Acadia Insurance Company	Berkley Life and Health Insurance Company	Midwest Employers Casualty Company
Admiral Indemnity Company	Berkley National Insurance Company	Nautilus Insurance Company
Admiral Insurance Company	Berkley Regional Insurance Company	Preferred Employers Insurance Company
American Mining Insurance Company	Berkley Regional Specialty	Queen's Island Insurance Company, Ltd.
Berkley Argentina de Reaseguros S.A.	Insurance Company	Riverport Insurance Company
Berkley Assurance Company	Carolina Casualty Insurance Company	StarNet Insurance Company
Berkley Insurance Company	Clermont Insurance Company	Syndicate 1967 at Lloyd's
Berkley International Aseguradora de Riesgos del Trabajo S.A.	Continental Western Insurance Company	Tri-State Insurance Company of Minnesota
Berkley International do Brasil Seguros S.A.	Fireman's Insurance Company	Union Insurance Company
Berkley International Seguros Colombia S.A.	of Washington, D.C.	Union Standard Lloyds
Berkley International Seguros S.A.	Gemini Insurance Company	W. R. Berkley Europe AG
Berkley International Seguros S.A. (Uruguay)	Great Divide Insurance Company	W. R. Berkley Insurance (Europe), Limited
	Key Risk Insurance Company	

W.R. Berkley Insurance Group Ratings

A+ (Superior) Financial Size Category XV by A.M. Best

A+ (Strong) by Standard & Poor's



**UNION
STANDARD**
INSURANCE GROUP

a Berkley Company

preferred commercial property and casualty insurance

About Products and Services Claim Service Billing and Payment Plans Careers Contact Us Find an Agent Agent Portal

TEAMWORK

commercial insurance done the right way, teamwork

senior management

Keith Mitchell
President

Edmund P. Hemmerick, CPCU, AIAF, ACP
Senior Vice President Operations

Jeff Hockersmith, CPA
Senior Vice President, Treasurer & Chief Financial Officer

Cathleen Link, CPCU
Senior Vice President, Chief Underwriting Officer

Michael W. Smith
Senior Vice President Claims

Tom Cawley, FCAS
Vice President Chief Actuary

Dave Hinton, CIC
Vice President Sales

Jacquelynne Hurst
Vice President Marketing

Gregory R. Perkins
Vice President Information Services

Leslie Horwitz, SPHR
Vice President Human Resources

Ty Simmons
Vice President General Counsel & Secretary

Eugene Phillips, CIC, CSP, ARM
Regional Vice President

Niclas Radberg, CPCU, CIC
Regional Vice President

Ronald Roman, CPCU
Regional Vice President



**E-PAY
EXPRESS**

US Express
Agent Portal
[Agent Portal Log-In. Click Here!](#)





Search



Home



My Network



Jobs



Messaging



Not

Website Do's and Don'ts - Attorneys, turn your website into a lead generator with these



3rd

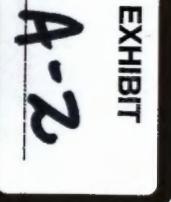
Jeff Hockersmith

Senior Vice President, CFO and Treasurer at Union Standard Insurance Group (a W. R. Berkley Company)

Union Standard Insurance Group (a W. R. Berkley Company) • University of Kansas

Dallas/Fort Worth Area • 404

[Send InMail](#)



Experience

Senior Vice President, CFO and Treasurer



Union Standard Insurance Group (a W. R. Berkley Company)

Mar 2013 – Present • 4 yrs 3 mos

Irving, Texas

Vice President, CFO and COO and Vice President, Controller

QBE Americas, Inc.

Mar 2011 – Feb 2013 • 2 yrs

Plano, Texas and Irving, Texas

[See description](#) ▾

→ C Secure | https://www.linkedin.com/in/cathy-link-b1a62ba/

in Search Home My Network Jobs Messaging

Legal Management Job Bank - Post your résumé for law office recruiters or apply for posit

Cathy Link

SVP and Chief Underwriting Officer at Union Standard Insurance Group (a W. R. Berkley Company)

Union Standard Insurance Group (a W. R. Berkley Company) • Drew University
Dallas/Fort Worth Area • 500+

Send InMail

Secure | https://www.linkedin.com/in/michael-smith-a8927b12/

in Search Home My Network Jobs Messaging No

Attorney Needed ASAP - Crucial need for local attorney in your area. View new case

Michael Smith

Claims - VP at Union Standard Insurance Co.

Union Standard Insurance Co.

Dallas/Fort Worth Area • 6

Send InMail

Experience

Claims - VP
Union Standard Insurance Co.

Secure | https://www.linkedin.com/in/dave-hinton-667a5214/

in Search Home My Network Jobs Messaging Not

Attorney Needed ASAP - Crucial need for local attorney in your area. View new case



3rd

Dave Hinton
Vice President of Sales
Union Standard Insurance Group (a W. R. Berkley Company)
Irving, Texas • 500+ 

[Send InMail](#)

Experience

Vice President of Sales
 Union Standard
Union Standard Insurance Group (a W. R. Berkley Company)

Secure | https://www.linkedin.com/in/jacquelynne-hurst-0487b413/

in Search Home My Network Jobs Messaging No

Attorney Needed ASAP - Crucial need for local attorney in your area. View new case

Jacquelynne Hurst
V.P. Marketing Union Standard Insurance Group
Union Standard Insurance Group • Southern Methodist University
Dallas/Fort Worth Area • 128 a
[Send InMail](#)

Experience

Vice President Marketing and Underwriting Services
Union Standard Insurance Group
Jun 1998 – Present • 19 yrs

Secure | https://www.linkedin.com/in/greg-perkins-31579040/

in Search Home My Network Jobs Messaging Not

Attorney Needed ASAP - Crucial need for local attorney in your area. View new case



Greg Perkins
VP Information Services - CIO at Union Standard Insurance Group
Union Standard Insurance Group • UTD
Dallas/Fort Worth Area • 293 ●
[Send InMail](#)

Experience

VP Information Services - CIO
Union Standard Insurance Group
Aug 1981 - Present • 35 yrs 10 mos
Irving, TX



Search



Home



My Network



Jobs



Messaging

Not

Attorney Needed ASAP - Crucial need for local attorney in your area. View new case



3rd



Leslie Horwitz MBA,SPHR, SHRM-SCP, PMP

Vice President of Human Resources at Union Standard Insurance Group (a W. R. Berkley Company)

Union Standard Insurance Group (a W. R. Berkley Company) • University of North Texas

Dallas/Fort Worth Area • 500+

[Send InMail](#)

Results driven leader with progressive background in HR services delivery and talent development. Strong business acumen and successful track record developing and implementing strategies to positively impa... [See more](#)

Experience

Vice President of Human Resources

Union Standard Insurance Group (a W. R. Berkley Company)

May 2015 – Present • 2 yrs 1 mo

Irving, Texas

Media (2)





Search



Attorney Needed ASAP - Crucial need for local attorney in your area. View new case



3rd

Ty Simmons
General Counsel

Union Standard Insurance Group (a W. R. Berkley Company) • Baylor University School of Law
Dallas/Fort Worth Area • 160 a

[Send InMail](#)

Oversees corporate and regulatory compliance, insurance bad faith litigation, government relations and contract administration.

Experience

General Counsel



Union Standard Insurance Group (a W. R. Berkley Company)
Feb 2009 – Present • 8 yrs 4 mos
Irving, Texas

Oversees corporate and regulatory compliance, insurance bad faith litigation, government relations and contract administration.

Secure | https://www.linkedin.com/in/niclas-radberg-51023a30/

in Search Home My Network Jobs Messaging Notifications

Attorney Needed ASAP - Crucial need for local attorney in your area. View new cases.



3rd

Niclas Radberg
Branch Manager at Union Standard Insurance Group
Union Standard Insurance Group
Dallas/Fort Worth Area • 357 connections

Send InMail

Experience

Regional Vice President
Union Standard Insurance Group
Jul 2011 - Present • 5 yrs 11 mos
Dallas/Fort Worth Area

UNION STANDARD INSURANCE GROUP
a Berkley Company

preferred commercial property and casualty insurance

About Products and Services Claim Service Billing and Payment Plans Careers Contact Us Find an Agent Agent Portal

why choose US Send Payment Online →
Make a Mass Payment

we offer a payment schedule that works best for your business

billing and payment options

Union Standard Insurance Group offers a variety of installment plans and payment methods. Your independent agent will be happy to help you establish a payment schedule that works best for your business (including when your invoices are due).

Electronic Funds Transfer (EFT)

Electronic Funds Transfer (EFT) is the easiest way to make certain your payments are on-time, which is why our customers overwhelmingly prefer this method of payment. Monthly premiums are automatically transferred from your bank account. [Click here](#) for full details about EFT and to download our simple authorization form.

Pay On-line

Pay On-line by electronic check with Union Standard's on-line bill payment service E-PAY Express. [Click here](#) to visit the E-PAY Express web site, enroll, and begin making on-line payments by electronic check.

Do you have questions about E-PAY Express? Click the link below for the most frequently asked questions.

FREQUENTLY ASKED QUESTIONS ▶

Pay by Phone

Pay by Phone is available if you require assistance with paying by electronic check. Call our Billing Department at 800-955-0325 option 7, Monday - Friday between the hours of 8am - 5pm CST.

Should you choose to pay your premiums by mail, please mail to:

Union Standard Insurance Group
Direct Bill Payments
P. O. Box 200530
Dallas, TX 75320-0530

Please include a copy of your invoice or policy number with your payment.
For FED EX and other services requiring a physical address, please send the payments to:

Union Standard Insurance Group
Direct Bill Payments
222 Las Colinas Blvd. W, Suite 1300
Irving, TX 75039-5433

For billing inquiries, or more information on any of our payment methods, please contact a billing representative at 800-955-0325 option 7, Monday - Friday between the hours of 8am - 5pm CST.

For any other questions regarding billing and collections, you can also email us at usgdbsupport@us-e.com.



Click here to pay your bill.



Agent Portal Log-In. [Click Here!](#)





**UNION
STANDARD**
INSURANCE GROUP

a Berkley Company

preferred commercial property and casualty insurance

About Products and Services Claim Service Billing and Payment Plans Careers Contact Us Find an Agent Agent Portal

why choose
US



a team culture where you can enjoy a rewarding career

Home > Jobs

Filter ▾

Keywords

Jobs Login

Current Job Listings 4 Total Job(s).

Below is a list of the current openings with our company. Click on the job title to learn more about the opening.

Commercial Underwriter - Dallas Branch

Irving, TX, USA | Full Time

Commercial Underwriter - Oklahoma City, OK

Oklahoma City, OK, USA | Full Time

Home Office Commercial Lines Underwriting

Irving, TX, USA | Full Time

Loss Control Representative (Trainee Position) - Irving, TX

Irving, TX, USA | Full Time

Sign Up For Job Alerts!

Name

Email

Corpus Christi, TX US

Send Me Jobs

Share this Page

